

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF LIVONIA EMPLOYEES'	:	Civil Action No. 1:07-cv-10329-RJS
RETIREMENT SYSTEM, On Behalf of Itself	:	
and All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	ECF CASE
	:	
vs.	:	LEAD PLAINTIFF'S NOTICE OF MOTION
	:	AND MOTION FOR FINAL APPROVAL OF
WYETH, et al.,	:	CLASS ACTION SETTLEMENT AND
	:	PLAN OF ALLOCATION OF
Defendants.	:	SETTLEMENT PROCEEDS AND AWARD
	:	OF ATTORNEYS' FEES AND EXPENSES
<hr/>	X	AND LEAD PLAINTIFF'S EXPENSES
		PURSUANT TO 15 U.S.C. §78u-4(a)(4)

PLEASE TAKE NOTICE that Lead Plaintiff hereby moves the Court for entry of orders and/or judgments (1) finally approving the settlement of the captioned Litigation, (2) approving the Plan of Allocation of settlement proceeds, (3) awarding Lead Counsel attorneys' fees of 24.5% of the Settlement Fund, plus expenses incurred in the Litigation, and (4) awarding Lead Plaintiff's expenses pursuant to 15 U.S.C. §78u-4(a)(4). This Motion is based upon the Settlement Agreement dated as of November 7, 2012 and the Exhibits annexed thereto, the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds, the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Lead Plaintiff's Expenses Pursuant to 15 U.S.C. §78u-4(a)(4), the declarations filed in support thereof, and all other proceedings herein. Accordingly, Lead Plaintiff, by and through Lead Counsel, will request this Court, before the Honorable Richard J. Sullivan, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York on March 1, 2013, at 2:30 p.m., to enter final judgment and orders finally approving the settlement, approving the Plan of Allocation, awarding Lead Counsel the requested attorneys' fees and expenses and Lead Plaintiff's expenses pursuant to 15 U.S.C. §78u-4(a)(4).

DATED: January 10, 2013

Respectfully submitted,

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Lead Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 10, 2013.

s/ Tor Gronborg

TOR GRONBORG

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- {No manual recipients}